

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

MARK GOTTSLEBEN, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

INFORMA MEDIA, INC. F/K/A PENTON MEDIA,  
INC.,

Defendant.

CASE NO. 1:22-cv-00866-HYJ-RSK  
CLASS ACTION

Chief Judge Hala Y. Jarbou  
Magistrate Judge Ray Kent

**DEFENDANT INFORMA MEDIA, INC.’S MOTION TO DISMISS**

Defendant Informa Media, Inc. (“Defendant”) respectfully requests that the Court dismiss the Complaint (Dkt. No. 1) of Plaintiff Mark Gottsleben (“Plaintiff”), with prejudice, pursuant to Federal Rule of Civil Procedure 12(b)(6). In support of this Motion, Defendant hereby submits the attached Memorandum and states as follows:

1. The action is barred, in its entirety, by the applicable statute of limitations.
2. Even if the action is not time-barred, Plaintiff fails to plead facts sufficient to state a claim for violation of Michigan’s Preservation of Personal Privacy Act, H.B. 5331, 84th Leg. Reg. Sess., P.A. No. 378, §§ 1-4 (Mich. 1988), id. § 5, added by H.B. 4694, 85th Leg. Reg. Sess., P.A. No. 206, § 1 (Mich. 1989) (the “PPPA”). The Complaint includes no facts whatsoever about the disclosure of any customer information, including Plaintiff’s information, by Defendant.

In accordance with Local Civil Rule 7.1(d), Defendant sought Plaintiff’s concurrence in this Motion during a telephone call on November 30, 2022. Plaintiff’s counsel indicated that Plaintiff opposes the relief sought herein.

DATED: December 5, 2022

Respectfully submitted,

BLANK ROME LLP

By: /s/ Ana Tagvoryan

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Ana Tagvoryan  
ana.tagvoryan@blankrome.com  
Harrison Brown  
harrison.brown@blankrome.com  
2029 Century Park East, 6th Floor  
Los Angeles, CA 90067  
Tel.: 424.239.3400  
Fax: 424.239.3434

Attorneys for Defendant  
INFORMA MEDIA, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys or parties of record.

By: /s/ Ana Tagvoryan  
Ana Tagvoryan